

EXHIBIT A

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
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January 02, 2002

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12551

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

		<u>Hours</u>
11/01/01 BB	Prepare expert binder for Ms. Pelletier (1.0 hrs.); continue reading, analyzing and incorporating new correspondence and documents into indexed case files and electronic files (4.0 hrs.); incorporate expert invoices into case files (.2 hrs.).	5.20
CHM	Meeting with experts re development issues in Jersey City.	8.20
WH	Conferences with Ms. Banks and selected Grace experts re obtaining invoices for deposition time and expenses (1.2 hrs.); review Grace experts' documents for designation as trial exhibits and confer with selected experts re same (6.4 hrs.); revise database re trial exhibits/materials (.8 hrs.); conference with Mr. Valera re status of his assignments (.4 hrs.); conference with Ms. Pelletier re assignments (.3 hrs.).	8.90

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		<u>Hours</u>
11/01/01	AP Review correspondence (.5 hrs.); review HH coded documents related to human health (2.3 hrs.).	2.80
	MM Review recent correspondence (.3 hrs.); search various case material and Grace databases for additional material requested by Ms. Pelletier not previously located during recent production (3.6 hrs.).	3.90
11/02/01	MM Office conference with Ms. Banks and Ms. Manago re various case management issues (.7 hrs.); review recent correspondence and incorporate into case files (.5 hrs.); follow-up office conference with Ms. Banks re various assignments completed for Ms. Pelletier and Mr. Marraro and their status (.9 hrs.).	2.10
	AP Designated deposition testimony for pretrial statement (1.5 hrs.); draft and revise statement of legal issues for pretrial submission (2.0 hrs.); research procedural and legal issues relating to pretrial statement including requirements for use of deposition testimony and timing of motions in limine (2.0 hrs.).	5.50
	BB Consult with Ms. Manago and Moasser re bankruptcy case records (.7 hrs.); review, analyze, scan and incorporate new correspondence and letters to court into indexed case files and electronic case files, and create new files (3.7 hrs.).	4.40
	CHM Review and comment on Bankruptcy stipulation and consent order (.5 hrs.); conference with D. Carickhoff (.3 hrs.); review Chapman deposition (1.2 hrs.); prepare letter to Lowenstein re missing documents (.7 hrs.); conference with Dr. Chapman (1.0 hrs.).	3.70
	WH Conferences with Ms. Banks and Ms. Pelletier re trial-prep assignments (.9 hrs.); review record for relevant documents to be used in challenging Honeywell's costs (3.2 hrs.); confer with Mr. Marraro re status of trial prep	8.70

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		<u>Hours</u>
	(.4 hrs.); revise list of stipulated facts for pretrial order (.7 hrs.); review deposition transcript re trial designations for trial (3.5 hrs.).	
11/05/01 BB	Research case indices and collect and prepare pertinent document for Mr. Marraro (.2 hrs.); research production database for documents for trial exhibits document review and incorporate into review log (.8 hrs.); continue preparation of documents for trial exhibit review (2.4 hrs.); incorporate new case documents into electronic case files (.1 hrs.).	4.50
AP	Review new Riverkeeper complaint and draft memo comparing allegations with ICO complaint (2.5 hrs.); review all case pleadings for allegations relating to owner or operator status of Grace (3.1 hrs.).	5.60
WH	Review and analyze Mark Harris' letters to NJDEP re Kirk Brown, Peter Chapman, Elizabeth Anderson, Max Costa and Dr. Belsito (1.3 hrs.); conferences with Mr. Marraro and selected experts re Harris letters and rebuttal points (1.2 hrs.); confer with Ms. Banks re expert billing issues and review documentation re same (.6 hrs.); review correspondence from Lowenstein Sandler re production of Dr. Brown's documents and confer with Dr. Brown and staff re same (.8 hrs.); review Dr. Brown documents requested by Honeywell (.6 hrs.); review SI Group invoice re expert work and confer with Mr. Golliday re same (.4 hrs.); review amended complaint in Riverkeepers action (.3 hrs.); review and collect documents for use as trial exhibits (3.4 hrs.).	8.60
11/06/01 WH	Conference with Mr. Golliday re Harris letter, rebuttal points and other remediation issues at the site (.8 hrs.); review materials from Mr. Golliday (.3 hrs.); legal research re site remediation issue (.6 hrs.); conference with Ms. Parker re collecting/reviewing additional	8.80

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Hours

expert documents for production to Honeywell (.3 hrs.); review documents from Dr. Brown re MINTEC model (.4 hrs.); review new Deming documents produced by Honeywell and letter from counsel re same (2.2 hrs.); review new case correspondence and pleadings (.4 hrs.); conferences with Ms. Banks re preparing trial prep materials (.6 hrs.); work on database re trial/cross-examination materials (3.8 hrs.).

11/06/01 AP Review pleadings and draft memorandum regarding owner/operator status (3.4 hrs.); review "HH" coded documents (3.1 hrs.). 6.50

TP Reviewed recent correspondence re requests for additional expert data (.6 hrs.); e-mails and phone conferences with Ms. Banks requesting information and gathering of other correspondence re production of expert materials (1.1 hrs.); reviewed deposition transcripts for experts where additional documents and computer models were requested to determine whether the expert had in fact testified that computer models were used, or data output was available to respond to requests for additional data (2.2 hrs.); e-mail to Mr. Lape of Dr. Anderson's office with questions re model used for data printout that was produced (.2 hrs.); e-mail to Messrs. Marraro and Hughes re status of issues with Grace expert computer model productions (.2 hrs.). 4.30

BB Consult with Ms. Parker by telephone and email pertinent information in preparation for follow-up correspondence with plaintiff's request for expert's computer printout (.3 hrs.); research correspondence and expert's produced supporting documents re follow-up response (.8 hrs.); consult with Mr. Hughes re preparation of trial exhibit list (.2 hrs.); research production files, collect and prepare pertinent document for trial exhibit for Mr. Hughes (.3 hrs.); review, verify and prepare summary of Grace experts pre-petition 4.70

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Hours

invoices for Messrs. Marraro and Hughes and prepare email to client (1.1 hrs.); create new case files re pre- and post-petition invoices and incorporate into case files (1.2 hrs.); review, analyze, organize, and prepare new correspondence and case documents for incorporation into case files (.8 hrs.).

11/07/01 TP	<p>Reviewed all digital images from Dr. Anderson's site visit to determine which ones were included with her declaration and to identify the ones that were missing from file copy (2.9 hrs.); phone conference with Mr. Galladay of Mr. Brown's office re data output and email to Mr. Hughes re same (.3 hrs.); phone conference and email with Mr. Lape in response to request for information re Dr. Anderson's computer data and emailed summary re same to Mr. Marraro (.4 hrs.); search for chart re Grace experts and emailed request to Ms. Banks to locate and send to me for purpose of making phone calls to experts for additional data for production (.3 hrs.).</p>	3.90
BB	<p>Research status of outstanding pre-petition bills re Grace experts for Mr. Marraro (.4 hrs.); place calls to client and to expert re same (.4 hrs.); consult with Mr. Morgan, Ms. Campbell and Ms. Rupp re same paid and outstanding invoices (1.0 hrs.); review expert's exhibit list for pertinent information for Mr. Hughes and report on same (.4 hrs.); collect and prepare pre-petition invoices and prepare cover letter and FedEx package to client (.8 hrs.); consult with Mr. Hughes re documents designated for trial exhibits (.2 hrs.); consult with Ms. Kelly re documents designated for trial exhibits (.3 hrs.); collect documents for Ms. Parker re follow up on requests for production of electronic files and research and verify responses to defendant's correspondence requesting documents (1.4 hrs.).</p>	4.90

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		<u>Hours</u>
11/07/01	AP Draft and revise Statement of Facts and Legal Issues for pretrial statement.	4.00
	WH Revise list of draft stipulations for review by Mr. Agnello (1.8 hrs.); review deposition transcripts from coverage case re designations for pretrial order (6.8 hrs.); confer with Dr. Goad's staff re trial prep issues and status of assignments (.7 hrs.).	9.30
	RLS Office conference with Ms. Banks re scanned photographs (.1 hrs.); print scan pictures (.2 hrs.).	0.30
	CHM Revise legal issues for pre-trial (2.2 hrs.); work on experts invoices with calls to experts (2.0 hrs.); review new cases on CERCLA section 113 contribution (.6 hrs.); conference with client (.5 hrs.).	5.30
11/08/01	BB Respond to request from Mr. Agnello re Bankruptcy documents, collect and prepare documents and prepare fax message (.5 hrs.); research U.S. Bankruptcy Court for District of Delaware PACER website for pertinent documents, download, prepare and incorporate into indexed case files (.7 hrs.); make calls to Mr. Senfleben and Mr. Chandler re expert's spreadsheet of outstanding pre- and post-petition invoices and arrange for email of spreadsheet to client and delivery of supporting documentation (.6 hrs.); consult with Mr. Hughes re designated trial exhibits (.2 hrs.); review, coordinate, organize and prepare designated trial exhibits for entry on exhibits list (2.1 hrs.); consult with Ms. Kelly re continuation of entries on trial exhibits list (.2 hrs.); research Mutual production documents for best copy of pertinent trial exhibit for Mr. Hughes prepare same and incorporate into collection of exhibits (.7 hrs.); review, sort, organize, and prepare new correspondence and documents for incorporation into indexed case file (1.5 hrs.).	6.50

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		<u>Hours</u>
11/08/01	WH Conduct legal research and review expert reports and deposition transcripts in re motion to exclude Honeywell expert (6.4 hrs.); work on selected matters relating to draft pretrial order (1.4 hrs.); confer with Dr. Valera re review of new Deming documents (.4 hrs.); confer with non-testifying expert re sampling issue (.4 hrs.); review correspondence from Mr. Chandler re CEH payment issue (.2 hrs.).	8.80
	NAB Incorporate case documents into electronic files and create hyperlink for same on the appropriate indices.	2.00
	AP Finalize draft statements of facts and legal issues and forward to Carella Byrne for comment (4.9 hrs.); revise memorandum regarding owner/operator status per C. Marraro (3.7 hrs.).	8.60
	CHM Review CLH comments to DEP re Belsito and Anderson (2.2 hrs.); conference call with Dr. Goad re possible response (2.0 hrs.); conference with R. Oslan re various issues (1.2 hrs.).	5.40
11/09/01	BB Incorporate new correspondence and documents into electronic and case files and create new case files (4.7 hrs.); consult with Mr. Hughes re site document for trial exhibit (.1 hrs.); prepare additional trial exhibit documents (.8 hrs.).	5.60
	CHM Work on stipulations (2.5 hrs.); conference with client re development (.7 hrs.); review letter to Lowenstein re meeting and conference re document discovery (.5 hrs.).	3.70
	WH Conferences with Drs. Goad and Davis re swale upgrade and site sampling issues (.9 hrs.); review relevant DEP correspondence and other materials re sampling issue (1.4 hrs.); conferences with Ms. Banks re collecting documents for use at trial and review same (1.8 hrs.); review deposition transcript re	9.40

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		<u>Hours</u>
	designations for trial (3.4 hrs.); confer with Mr. Golliday re Mark Harris letter and related site remediation issues (.7 hrs.); review articles from Mr. Golliday re chromium remediation issue at site (1.2 hrs.).	
11/12/01	CHM Prepare October fee application.	2.10
	CHM Prepare letter to Lowenstein re document discovery (.8 hrs.); conference with client re development issues (.5 hrs.); review draft development plan documents (.5 hrs.); work on expert invoice issues (1.5 hrs.).	3.30
	WH Review deposition transcripts for selected Honeywell experts and work on cross-examination outline for same (5.3 hrs.); work on in limine motion (1.6 hrs.); legal research re in limine motion (.8 hrs.); review invoice from the Brattle Group and confer with Ms. Koch re status of assignments (.6 hrs.).	8.30
	BB Review, analyze, organize, prepare and incorporate new correspondence, court filing and case documents into electronic and indexed case files and create new case files (5.9 hrs.); collect and prepare email of pertinent bankruptcy information for Mr. Marraro (.2 hrs.).	6.10
11/13/01	BB Continue incorporating new correspondence, court filing and case documents into indexed case files (5.3 hrs.); prepare email response to email request from case expert re review of deposition of rebuttal expert (.5 hrs.); prepare cover letter and FedEx package to expert (.5 hrs.); cross reference designated documents against existing exhibit list and verify undesignated documents for Mr. Hughes (.8 hrs.); cross reference case maps against expert supporting documents in preparation for trial exhibit review (.4 hrs.)	7.40

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		<u>Hours</u>
11/13/01 MM	Office conference with Ms. Pelletier re status of various matters, including to have keys cut for the Roosevelt Drive In site (.4 hrs.); travel to and from keysmith and had two sets of keys made for the stated site and travel to FedEx downtown to be forwarded overnight with cover letter to Polly Newbold (1.6 hrs.); review recently correspondence (.4 hrs.).	2.40
AP	Calls and correspondence with P. Newbold and M. Moasser regarding site sampling and authorization to enter site.	1.40
WH	Confer with Ms. Pelletier and Ms. Newbold re site access issue for Trillium (.2 hrs.); review new case correspondence and confer with Ms. Banks re same (.6 hrs.); review selected documents from CTEH and designate as trial exhibits (3.9 hrs.); revise trial database re same (.8 hrs.); work on in limine motion re expert (.4 hrs.).	8.50
NAB	Incorporate case documents into electronic files and create hyperlink for same on the appropriate indices.	4.40
CHM	Work on stipulation of fact (4.5 hrs.); conference with client re development issues (.7 hrs.); meeting with plaintiffs' counsel re RCRA issues (1.8 hrs.); dinner meeting with client (2.0 hrs.).	9.00
11/14/01 MM	Office conference with Ms. Banks re various issues relating to admissions (.2 hrs.); e-mail to Messrs. Marraro and Hughes, and Ms. Pelletier re various task to be handled (.1 hrs.); office conference with Ms. Pelletier re completing various task in preparation for pretrial (.3 hrs.); office conference with Mr. Hughes re same (.2 hrs.); office conference with Mr. Marraro re same (.1 hrs.); review case pleading files and produce copies of all admissions submitted by Allied (i.e. Honeywell) in preparation of creating a chart detailing their response per Mr. Hughes request (.8 hrs.); review deposition	7.60

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Hours

abstracts re producing any that relate to prior knowledge of chrome at site (1.7 hrs.); preliminary review of depositions taken of Alotsius M. Sebian and Richard M. Cohen in preparation of preparing summaries of same per Ms. Pelletier's request (3.4 hrs.); case management (.8 hrs.).

11/14/01 BB	Confer with Ms. Kelly re trial exhibits entries (.4 hrs.); consult with Mr. Hughes on research of NJDEP/defendant correspondence re resolution of north swale issue (.1 hrs.); continue cross referencing undesignated documents against designated documents and verify undesignated documents for Mr. Hughes (2.8 hrs.); prepare and organize verified undesignated documents for attorney review (1.1 hrs.); research case files for pertinent correspondence re north swale issue for Mr. Hughes (2.0 hrs.); collect and prepare deposition transcripts and memo re same for Ms. Pelletier (2.4 hrs.).	8.80
WH	Conferences with Messrs. Marraro and Goad and staff re swale sampling issue (1.2 hrs.); review excerpts from Dr. Rifkin's deposition (.8 hrs.); review documents produced by Honeywell for designation as trial exhibits (4.4 hrs.); work on database re trial exhibits/cross-x materials (1.6 hrs.); conferences with Ms. Banks re collection and review of exhibits (.7 hrs.).	8.70
NAB	Discuss screening of exhibits with Ms. Banks (.5 hrs.); scan expert list of documents relied upon by various experts to in preparation for review (1.0 hrs.); review and cross reference expert's list of documents relied upon in preparing expert report to that of other experts to eliminate duplicate trial exhibits (6.1 hrs.); create reference list of duplicate documents to be pulled from boxes of potential exhibits (.9 hrs.).	8.50

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		<u>Hours</u>
11/14/01	AP Conference with M. Moasser re assignment to abstract several depositions (.3 hrs.); review correspondence, including transcripts of 10/27 hearing and memo re damages (1.0 hrs.); review additional documents produced by Rifkin Assoc. (1.2 hrs.).	2.50
11/15/01	AP Calls with P. Newbold and M. Moasser re site access (.4 hrs.); review documents produced by Honeywell (2.0 hrs.).	2.40
	CHM All-day meeting in New Jersey re trial preparation (8.0 hrs.) and site visit (1.4 hrs.).	9.40
	WH Confer with Mr. Marraro re Costa payment and prepare follow-up letter to Dr. Costa re same (.7 hrs.); conferences with Grace in-house counsel re payment of experts and related matters (.4 hrs.); work on cross-examination materials for experts (3.8 hrs.); work on in limine motions (1.3 hrs.); confer with Ms. Koch re NCP compliance issue and collect evidence in support of same (1.8 hrs.); confer with Mr. Golliday re site remediation issue (.4 hrs.); legal research re same (.4 hrs.).	8.80
	MM Telephone conferences with Ms. Newbold re unable to open lock at Roosevelt Drive In site to take samples (.2 hrs.); office conferences with Ms. Pelletier re same (.3 hrs.); finalize review of case material re deposition abstracts of Joseph Szatmary and Daniel Swallick produced by Honeywell and forward same to Mr. Hughes with memorandum for review (1.6 hrs.); continue to review depositions of Alotsius M. Sebian and Richard M. Cohen produced by Honeywell in preparing deposition abstracts of same per Ms. Pelletier's request (1.4 hrs.); case management (.9 hrs.).	4.40
	BB Collect and prepare pertinent document for Mr. Hughes (.2 hrs.); consult with Mr. Hughes re preparation of deposition designations (.3 hrs.); review and resolve issues re designated trial	2.70

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		<u>Hours</u>
	exhibits for Mr. Hughes and consult with Ms. Kelly re same (2.2 hrs.).	
11/15/01 NAB	Review and cross reference expert's list of documents relied upon in preparing expert report to that of other experts to eliminate duplicate trial exhibits (6.9 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (.6 hrs.)	5.20
TP	Responded to email from Ms. Pellitier and provided research re NCP compliance.	0.30
11/16/01 BB	Research correspondence files and collect pertinent correspondence re expert invoices for Mr. Hughes (.6 hrs.); consult with Ms. Campbell re expert invoices (.1 hrs.); continue researching production and case files for NJDEP/defendant correspondence regarding improvement of the site North Swale, collect, organize and prepare for Mr. Hughes (1.8 hrs.).	2.50
WH	Review Geomega invoice and confer with Ms. Middlesworth re surface water discharge issue and other matters (.9 hrs.); review letter from Mr. Caffrey re production of Dr. Valera's files and confer with Dr. Valera re same (.7 hrs.); research re applicability of work product doctrine to work conducted by testifying expert (2.3 hrs.); review site photos to be provided to Ms. Flax (.3 hrs.); review and mark deposition transcripts re designations for trial (3.2 hrs.); review and collect evidence re Mutual knowledge issue (1.2 hrs.).	8.60
MM	Telephone conferences with Ms. Flax re producing all original photographs taken of various sites for her immediate review (.3 hrs.); office conference with Ms. Banks re same (.2 hrs.); search case material and produced all stated photos (1.1 hrs.); cross-reference original photos recovered to itemized list to assure all have been produced (.7 hrs.); draft letter with original photos and forward to Ms. Flax via FedEx (.6 hrs.); follow-up office	5.90

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Hours

	conference with Ms. Bank re coverage of various case matters (.4 hrs.); continue to review the deposition of Alotsius M. Sebian and draft preliminary abstract for Ms. Pelletier (2.4 hrs.); office conference with Mr. Hughes re reviewing recently received videotapes and providing him with a brief overview of each (.2 hrs.).	
11/16/01 NAB	Review and cross reference expenses incurred in connection with expert's list of documents relied upon in preparing expert report (5.8 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (1.5 hrs.)	7.50
11/17/01 MM	Finalize the review and abstract regarding the deposition taken of Alotsius M. Sebian per Ms. Pelletier's request (3.1 hrs.); preliminary review of all admissions submitted by Honeywell and begin to draft chart outlining their responses per Mr. Hughes request (3.4 hrs.).	6.50
AP	Review documents produced by Honeywell for use in preparation of pre-trial.	7.90
11/18/01 AP	Review documents produced by Honeywell for use in preparation of pre-trial.	4.50
11/19/01 MM	Office conference with Ms. Marraro re various pending assignments (.6 hrs.); office conference with Mr. Smith re assigning task to be completed (.3 hrs.); forward memo to Mr. Smith with instructions re same (.2 hrs.); finalize the review and deposition abstract on Alotsius M. Sebian and draft memorandum to file re same (1.4 hrs.); preliminary review and abstract of Richard Martin Cohen, pending completion (4.3 hrs.); continue to prepare chart reflecting Honeywell's admissions per Mr. Hughes request (1.1 hrs.); case management (.2 hrs.).	8.10

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		<u>Hours</u>
11/19/01	RLS Office conference with Ms. Manago regarding deposition summary project (.7 hrs.); office conference with Mr. Moasser regarding video tape review (.2 hrs.); retrieve and prepare materials (.9 hrs.).	1.30
	WH Conferences with Ms. Banks re collecting relevant documentation re swale discharges to Hackensack River and other site issues (.6 hrs.); review site-related correspondence and other documents provided by Ms. Banks and confer with Dr. Goad re same (1.8 hrs.); prepare letter to Dr. Costa re payment issue and confer with Ms. Banks re back-up documentation (.6 hrs.); review invoice from SI Group and confer with Mr. Golliday re status of projects (.5 hrs.); confer with Ms. Shelnuitt re trial prep issues and status of assignment (.4 hrs.); review documents provided by Ms. Shelnuitt re groundwater and toxicology issues (4.3 hrs.).	8.20
	NAB Confer with Ms. Banks regarding status of potential expert documents to be used as exhibits (.4 hrs.); review and cross reference expert's list of documents relied upon in preparing expert report (4.8 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (.5 hrs.).	6.50
11/20/01	CHM Conference with Chapman re various issues (1.2 hrs.); review CLH letters and outline re response (3.0 hrs.); conference with Goad re various sampling issues (.6 hrs.); conference with consultants re invoices (.6 hrs.).	5.40
	MM Review recent correspondence distributed by Ms. Campbell (.3 hrs.); preliminary review of Richard Martin Cohen's lengthy deposition and begin to abstract it accordingly (2.9 hrs.); office conference with Mr. Hughes re producing Peter Deming's 2/13/01 deposition and all preparation material (.1 hrs.); search case material re same and produce requested	5.40

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Hours

	material to Mr. Hughes (.9 hrs.); follow-up office conference with Mr. Hughes re producing various deposition preparation material relating to Mr. Deming sent to Dr. Julio Varela (.1 hrs.); search case material re same (1.1 hrs.).	
11/20/01 NAB	Refer to reference list of duplicate documents and pull documents relied upon by experts that have already been referenced (2.7 hrs.); review and cross reference expert's list of documents relied upon in preparing expert report (4.7 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (.4 hrs.).	7.80
WH	Conferences with Dr. Goad re swale issue, past sampling data and related matters (.7 hrs.); confer with Dr. Valera re documents prepared in connection with Deming deposition (.6 hrs.); review same and conduct legal research re privilege claim (1.2 hrs.); work on trial brief and in limine motions (4.8 hrs.); review documents re human health issue for designation as trial exhibits and revise database entries re same (1.8 hrs.).	9.10
11/21/01 CHM	Work on stipulations (3.2 hrs.); conference call with Shelnutt re Belsito issues (1.0 hrs.).	4.20
MM	Review recent correspondence (.4 hrs.); finalize the review and deposition abstract on Richard Martin Cohen and draft memorandum to file re same (2.9 hrs.); case management (.8 hrs.).	4.10
TP	Office conference and email with Mrs. Manago, re document requested by Grace expert (Davis) (.3 hrs.); reviewed letter from consultant that suggested that this article be considered and advised Mrs. Manago re possible sources to obtain the document; searched prior emails to identify contact to obtain requested document and assisted Mrs. Manago in preparing email to Ms. Busbee with	1.50

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Hours

request to search for document (.8 hrs.); located and emailed electronic file of cases on NCP to Ms. Pelletier (.4 hrs.).

11/25/01 RLS	Review Lacey Alford deposition produced by Honeywell (1.5 hrs.); draft summary of deposition and review and edit summary (5.5 hrs.).	7.00
11/26/01 CHM	Lengthy conference with B. Hughes re production of Valera documents, deposition review and associated issues (1.2 hrs.); review first section of CLH's response (1.1 hrs.).	2.30
WH	Conference with Messrs. Goad and Marraro re payment matters and follow-up with client (1.2 hrs.); confer with Mr. Marraro re production of documents from litigation-related work conducted by Dr. Valera and conduct legal research re same (2.4 hrs.); confer with Mr. Marraro re production of expert documents (.3 hrs.); draft letter to Mr. Caffrey re production of Valera documents (1.7 hrs.); work on motion to compel (.8 hrs.); conferences with Ms. Banks and Ms. Bynam re collecting selected documents for use with experts (.8 hrs.); confer with Ms. Banks re FOIA request (.2 hrs.); legal research re evidentiary issue (.4 hrs.).	7.80
RLS	Conduct final review of deposition summary and make necessary changes (1.0 hrs.); office conference with Mr. Moasser regarding other videotapes to be reviewed (.1 hrs.); review other tapes (.5 hrs.); compose and edit summary of the tapes' content (2.3 hrs.); office conference with Mr. Moasser regarding project (.1 hrs.).	4.00
NAB	Review and cross reference expert's list of documents relied upon in preparing expert (5.8 hrs.); confer with Ms. Banks regarding conflict re above mentioned project (1.2 hrs.); add findings to reference list of duplicate	7.70

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Hours

	documents to be pulled from boxes of potential exhibits (.7 hrs.);	
11/26/01 MM	Draft memorandum to Ms. Pelletier attaching the depositions and abstracts of Alotsius M. Sebian and Richard M. Cohen for her review (.2 hrs.); office conference with Mr. Smith re status of completing review of various video tapes, pending (.1 hrs.); forward e-mail to Mr. Smith requesting him to review two additional videotapes and to complete abstracts on both (.2 hrs.); review memorandum received from Mr. Smith detailing all information contained on previously submitted videotapes to him for review (.3 hrs.); review faxed documents received from Julio E. Valera from Mr. Hughes and forward to Ms. Banks with memorandum re incorporating same into correspondence files (.3 hrs.); office conference with Mr. Hughes re status of compiling chart re Honeywell's admissions (.2 hrs.); preliminary review and set-up of chart re detailing Honeywell's admissions (1.4 hrs.); case management (.7 hrs.).	3.40
TP	Office conference with Mr. Hughes re Chapman deposition testimony (.2 hrs.); reviewed correspondence for letter requesting document (.3 hrs.).	0.50
11/27/01 BB	Consult with Mr. Hughes re trial preparation (.4 hrs.); consult with Ms. Bynum re trial exhibit preparation assignment (.4 hrs.); review and resolve issues re preparation of expert supporting document lists with Ms. Bynum (1.7 hrs.); research Server and consult with Ms. Rupp for pertinent documents re trial brief and prepare email re same for Mr. Hughes (.8 hrs.); make telephone call and prepare email in response to email from case expert re clarification of exhibits to deposition transcripts for preparation for trial (.5 hrs.); research case files to ascertain request for expert document referenced in expert deposition for Ms. Parker and Mr. Hughes, and	7.70

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Hours

prepare email of results (1.3 hrs.); consult with Mr. Hughes re FOIA request assignment re response to expert rebuttal (.2 hrs.); meet with copy service representative and assist Ms. Bynum with review of duplicate copies of expert supporting documents in preparation for trial exhibit review (.6 hrs.); review and analyze new correspondence and documents and prepare for incorporation into indexed case files (1.3 hrs.); incorporate new case documents into indexed case files (.8 hrs.).

11/27/01	TP	Summarize Chapman deposition testimony.	3.90
	CHM	Work on stipulations for pre-trial.	1.80
	RLS	Office conference with Ms. Manago and Ms. Banks regarding project (.6 hrs.); office conference with Ms. Banks regarding video tape review; review video tape of site and incorporate new material into memorandum to file re tapes' contents (.5 hrs.); incorporate deposition transcript of Alford Lacey into case file (.5 hrs.).	1.60
	WH	Confer with Ms. Pelletier and paralegals re production of documents from Dr. Chapman's expert files (.5 hrs.); review Chapman materials (.8 hrs.); work on trial brief (1.8 hrs.); confer with Mr. Moasser re review/analysis of Honeywell's discovery responses and preparation of chart re same (.4 hrs.); review memo from Mr. Moasser and revise same (.7 hrs.); review excerpts from site videotapes produced by Honeywell and confer with paralegal re summarizing same (.8 hrs.); confer with Mr. Agnello re expert discovery issue (.3 hrs.); finalize letter to Mr. Caffrey re production of Dr. Valera's documents and coordinate service of same (1.3 hrs.); review expert documents collected by Ms. Bynum (1.5 hrs.).	8.40

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		<u>Hours</u>
11/27/01	NAB Confer with Mr. Hughes regarding status of above project (.3 hrs.); review and cross reference expert's list of documents relied upon in preparing expert report (6.8 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (.4 hrs.);	7.50
	MM Review and incorporate Mr. Smith's 11/26/01 memorandum into files and produce copy of same to Mr. Hughes for review (.3 hrs.); office conference with Ms. Banks re case matters (.2 hrs.); continue to review and set-up of chart re detailing Honeywell's admissions (1.2 hrs.); forward e-mail to Mr. Hughes re status of stated chart and guidance (.1 hrs.); case management (.6 hrs.).	2.30
11/28/01	WH Confer with Messrs. Marraro and Nagy re PDM (.4 hrs.); collect and review documents produced by Honeywell and PDM re experimental treatment technology (1.8 hrs.); confer with Mr. Golliday re PDM technology (.6 hrs.); review invoices and confer with client re payment issues (.5 hrs.); conferences with Messrs. Senftleben and Goad and staff re payment of CTEH's outstanding invoices (1.2 hrs.); work on pretrial order issues (2.2 hrs.); review and revise database entries re trial exhibits (.6 hrs.).	7.30
	BB Consult with Mr. Hughes re outstanding expert invoices (.2 hrs.); conduct review of all communications re outstanding invoices and prepare collection of post-petition invoices (1.2 hrs.); prepare fax message and collection of invoices for client (.5 hrs.); research production database and document CDs for pertinent documents re PDM and case site for Mr. Hughes, collect and organize documents and prepare memo summarizing research results for Mr. Hughes (3.5 hrs.); research case files for pertinent discovery documents, collect, coordinate and prepare for Mr. Hughes (.9 hrs.); read, analyze, sort, organize,	11.30

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		<u>Hours</u>
	coordinate and incorporate new documents into indexed case files (1.5 hrs.); research case files for designated documents for trial exhibits, cross-reference and collect pertinent documents (2.1 hrs.); research the NJDEP web data system for 2001 Cr(VI) post-treatment remedial options article submitted to NJDEP for Mr. Hughes (1.6 hrs.).	
11/28/01	CHM Conference call with A. Nagy and followup re PDM (1.0 hrs.); conference with experts re invoices (1.5 hrs.); conference call with CLH re DEP comments (.3 hrs.); conference with R. Senftleben (.2 hrs.).	3.00
	NAB Review and cross reference expert's list of documents relied upon in preparing expert report (5.2 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (.4 hrs.); refer to reference list of duplicate documents and pull documents relied upon that have already been referenced (1.9 hrs.).	7.50
	TP Email and office conference with Ms. Banks and Manago re article requested by Mr. Brown's office.	0.60
	MM Review e-mail from Mr. Hughes re incorporating additional information into chart re detailing Honeywell's admissions (.1 hrs.); finalize stated chart (2.7 hrs.); draft memorandum attaching stated chart and provide all to Mr. Hughes for review (.2 hrs.); case management (.4 hrs.).	3.40
11/29/01	WH Conference with Mr. Brown re excavation issue and trial prep matters (.6 hrs.); review materials from Mr. Golliday re remediation issue (.6 hrs.); review and designate documents for use as trial exhibits (5.6 hrs.).	6.80
	BB Research State of Georgia Corporation Division and place calls re same for certificate of good standing (.6 hrs.); confer with Mr.	9.90

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Hours

Hughes re research results into defendant's site contractor issue and research for certificate of good standing (.2 hrs.); collect and prepare document re same for Mr. Hughes (.1 hrs.); prepare letter request for certificate of good standing (.4 hrs.); research Lexis for pertinent case re same for Mr. Hughes (4 hrs.); confer with Mr. Hughes re same (.1 hrs.); collect, verify and provide contact information for defendant's site contractor and client for Mr. Hughes (.4 hrs.); prepare letter and FedEx package of documents re PDM Environmental Svcs. to case expert for review for Mr. Hughes (.7 hrs.); incorporate same into case files (.2 hrs.); continue review, cross-reference, resolve issues and prepare documents for entry on designated trial exhibits list (7.1 hrs.).

11/29/01	MM	Review recent correspondence distributed by Ms. Campbell (.2 hrs.); office conference with Mr. Hughes (i.e., via e-mail) re producing electronic various of Honeywell's Admissions chart to him for comments (.2 hrs.); case management (.3 hrs.).	0.70
	NAB	Continue referring to reference list of duplicate documents and pull documents relied upon by experts (.3 hrs.); review and cross reference expert's list of documents relied upon in preparing expert report (6.6 hrs.); add findings to reference list of duplicate documents to be pulled from boxes of potential exhibits (.6 hrs.).	7.50
11/30/01	CHM	Meeting with expert in New York (5.2 hrs.); meeting with investigator (2.1 hrs.); review stipulation re Bankruptcy Court draft (.3 hrs.); conference with Plaintiffs re amended complaint (.5 hrs.).	8.10
	AP	Review recent case law regarding owner/operator status under CERCLA.	2.50
	BB	Incorporate new case documents into case files (.5 hrs.); continue reviewing, cross-referencing and quality checking entry of designated	3.90

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		<u>Hours</u>	
documents on trial exhibit list (1.5 hrs.); collect and cross reference admissions in re trial preparation for Mr. Hughes (1.9 hrs.).			
11/30/01	NAB	Review and analyze expert documents in preparation for attorney review for potential trial exhibits.	7.10
	MM	Review and incorporate all recently distributed memoranda into files (.2 hrs.); case management (.4 hrs.).	0.60
	WH	Collect trial exhibits and work on database of trial exhibits and cross-examination materials.	1.20
			<u>Amount</u>
Total Fees		548.60	\$122,783.00
11/30/2001	Less Deduction of 40% of Fees Per Agreement		(\$49,113.20)
Balance Due			<u>\$73,669.80</u>

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	96.10	130.00
Natasha A. Bynum, Legal Clerk	79.20	95.00
William Hughes, Counsel	154.20	305.00
Christopher H. Marraro, Partner	74.90	420.00
Mahmoude Moasser, Paralegal	60.80	130.00
Tamara Parker, Associate	15.00	260.00
Angela Pelletier, Associate	54.20	200.00
Reilly L. Smith, Paralegal	14.20	115.00

Wallace
King
&
Marraro
Branson

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WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

January 02, 2002

W. R. Grace & Co.
Attention: William Corcoran
Vice President-Public & Regulatory Affairs
7500 Grace Drive
Columbia, MD 21044

Invoice #12552

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>
11/02/01	RM Update case files and indices as necessary.	0.50
11/05/01	RM Review correspondence and update case files accordingly.	0.60
	CHM Review articles from client (.6 hrs.); conference with Spinello re status (.5 hrs.).	1.10
11/08/01	CHM Meeting with R. Oslan and D. Cleary and Medlar.	2.50
11/12/01	CHM Review articles from client (.3 hrs.); conference with EPA (.3 hrs.).	0.70
11/14/01	CHM Review articles from client.	0.60
11/27/01	CHM Review documents from client.	0.60
11/29/01	CHM Review articles from Grace; conference with EPA.	0.90
Total Fees		<div style="display: flex; justify-content: space-between;"> <div style="border-top: 1px solid black; width: 100px;"></div> <div style="text-align: right;"> <u>Amount</u> 7.50 \$2,814.50 </div> </div>

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Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	6.40	420.00
Rebecca Mitchell, Paralegal	1.10	115.00